

**EXHIBIT "A"**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE:  
James Henry Call  
Terrie Mace Call,

Case No.: 13-30686-KRH

Chapter 13

Debtor.

James Henry Call  
Terrie Mace Call,

Plaintiffs,

v.

Adversary Proceeding No. 15-03386-KRH

OneMain Financial, Inc., F/K/A CitiFinancial, Inc. ,  
Kimberly Rice and Beth Shaffer, TRUSTEES  
Defendants

AFFIDAVIT OF COUNSEL WITH RESPECT TO DEFAULT OF  
DEFENDANT OneMain Financial, Inc., F/K/A CitiFinancial, Inc., AND Kimberly Rice  
and Beth Shaffer, Trustees

Richard J. Oulton, counsel for Plaintiff(s), does depose and state under penalty of perjury as follows:

1. I am counsel for the Plaintiff(s) James Henry Call and Terrie Mace Call in the above-entitled adversary proceeding against the defendants, OneMain Financial, Inc., F/K/A CitiFinancial, Inc., and Kimberly Rice and Beth Shaffer, Trustees, (the "Defendants").
2. The Complaint to Determine Validity, Extent and Priority of Lien (the "Complaint") initiating this action was filed on July 15, 2015.
3. The Summons and Notice in the Adversary Proceeding ("the "Summons") was issued by the Clerk of this Court on July 17, 2015.

4. Pursuant to the Summons and rule 7012 of the Federal Rules of Bankruptcy Procedure, Defendants were required to file a responsive pleading within thirty (30) days after the issuance of the Summons, i.e. on or before August 17, 2015.
5. Defendants are residents or have designated offices in the Commonwealth of Virginia or are authorized to do business or are doing business in the Commonwealth of Virginia.
6. On July 17, 2015, Plaintiff effectuated service of the Summons and the Complaint on Defendant OneMain Financial, Inc., F/K/A CitiFinancial, Inc. by mailing via first class and/or certified mail, return receipt, postage prepared to the last known or registered address of the defendant.
7. On July 17, 2015, Plaintiff effectuated service of the Summons and the Complaint on Defendant Kimberly Rice and Beth Shaffer, Trustees by mailing via first class and/or certified mail, return receipt, postage prepared to the last known or registered address of the defendant.
8. The Summons and Certificate of Service were filed with this Court and are attached as **Exhibit B**.
9. OneMain Financial, Inc., F/K/A CitiFinancial, Inc., and Kimberly Rice and Beth Shaffer, Trustees have failed to file an answer or other responsive pleading on or before the deadline and are thereby in default.
10. To the best of my knowledge and belief, none of the Defendants are serving in active duty of the Armed forces of the United States, and are not infants or incompetent persons.

Date: August 18, 2015

By: /s/ Richard J. Oulton  
Richard J. Oulton VSB#29640  
*Counsel for Debtor/Plaintiff*  
AMERICA LAW GROUP, INC..  
8501 Mayland Drive, Suite 106  
Henrico, VA 23294  
Ph: 804-308-0053